BPED-930113MB

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JAN 14 3 20 PM 94

January 13, 1994

BY HAND

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20036

Attention: Chief, FM Branch

Re: File No. BPED-930618MG, Cornerstone, Community Radio, Inc., Flagler Beach, FL

Dear Mr. Caton:

On behalf of Cornerstone Community Radio, Inc., I am submitting herewith an original and two copies of an amendment to the above-referenced application. This letter is filed in response to the FCC staff's letter of September 21, 1993. The staff's letter originally sought a response within 60 days;, however, on November 22, 1993, counsel for Cornerstone wrote the FCC and requested an additional period of 60 days, to and including January 21, 1994, in which to file a response. This amendment is tendered within the period requested by Cornerstone and should be accepted for filing.

Questions concerning this amendment, and copies of all correspondence, should be directed to me.

Sincerely,

BIRCH, HORTON, BITTNER AND CHEROT

J. Geoffrey Bentley
Attorney for Cornerstone Community Radio, Inc.

cc: Scott A. Cinnamon, Esq. (w/ encl.)

January 12, 1994

Federal Communications Commission
SECRETARY
1919 M Street, N.W.
Washington, D.C. 20554

RE: NEW(FM), Flagler Beach, FL
Cornerstone Community
Radio, Inc.
BPED-930618MG
FCC: 1800B3-BJB

Dear Secretary:

Attached please find the original and two copies of an amendment for the above-captioned application. We ask that this amendment be added to and become a permanent part of the original.

An FCC letter with Reply No.: 1800B3-BJB requested that we amend our application to demonstrate compliance with 47 CFR 73:525. The enclosed amendment prepared by Doug Vernier, Broadcast Consultant, will show that our application is in compliance.

Our attorney, J. Geoffrey Bentley, had requested that we be given a 60-day extension for the above amendment. Due to communications with WCPX TV-6 and with Doug Vernier the enclosed amendment could not be completed within the original time period of 60 days. We do appreciate the FCC granting us sufficient time to prepare and file the enclosed amendment.

Respectfully,

Richard Van ~~Zandt~~
President
Cornerstone Community Radio, Inc.
2596 State Road 44
New Smyrna Beach, FL 32168

PH. (217) 487-7711

Doug Vernier
Broadcast Consultant
1600 Picturesque Drive
Cedar Falls, Iowa 50613
319-266-8402

EXHIBIT #
CHANNEL-SIX STUDY

Concerning the Application of
Cornerstone Community Radio

January 1994

Channel 212 2 kW (Vert)

This study shows compliance with the Commission's rules adopted June 30, 1985 relating to channel-six interference which may be caused by the instant facilities described herein. This proposal meets all requirements of Sec. 73.525.

Table A in Sec. 73.525 defines the cut-off distance for FM stations on channel 212 to be 195 km. There is only one channel-six television station within this cut-off distance, WCPXTV, Orlando, Florida. This station is located 85.69 km from the proposed FM transmitter at an azimuth of 174.4 degrees true north. WCPXTV operates with an effective radiated power of 100 kW using a directional antenna.

Page # 3 of this exhibit is a 1990 U.S. Census **American Indian Areas, Counties, County Subdivision, and Places** map showing the existing channel-six interference area. The interference area has been predicted using the procedures described in Section 73.525 (e) of the Commission Rules and Regulations. The NGDC 30 second terrain database was used to determine the antenna heights along 36 evenly spaced radials and the resulting distance to contour was calculated using the Commission's own TVFMINT FORTRAN computer algorithm. A study power of .05 kilowatts was used because the new facility proposes the use of vertical polarization only. Since the resulting interference area is entirely outside a city having a population of 50,000 or more, the following formula was applied: P(total) = P(Horizontal) + (P(Vertical/40).

The map shown on page # 4 of this exhibit is an enlargement of the pertinent section of the map shown on page #3. Using this map and a compensating-polar-planimeter the percentages of the census districts which fell inside the interference area was determined. The population within this area was calculated from the derived census districts proportions.

The following is a tabulation of the population found within the interference area:

Volusia County:

Ormond Beach Division	45,399
- Holly Hill	-11,141
- Ormond Beach Ct.	-22,724
Total	11,534

Area of Ormond Beach Division from page #4 map (less Holly Hill & Ormond Beach Ct.) = 1.3 Sq inches

Area within interference zone = .2 Sq inches

.2/1.3 = .154 or 15.4% (15.4% of 11,534) = 1,775 people

Flagler County:

Total County =	28,701
- Bunnell City	- 1,873
- Palm Coast CDP (Pt)	- 4,971
- Flagler Beach Div.	-14,936
Total	6,921

Total area less Flagler Beach Div, Palm Coast & Bunnell City = 8.02 sq inches

Area of interference within Flagler County = .83 sq inches

.83/8.02 = .103 or 10.3% (10.3% of 6,921) = 713 people

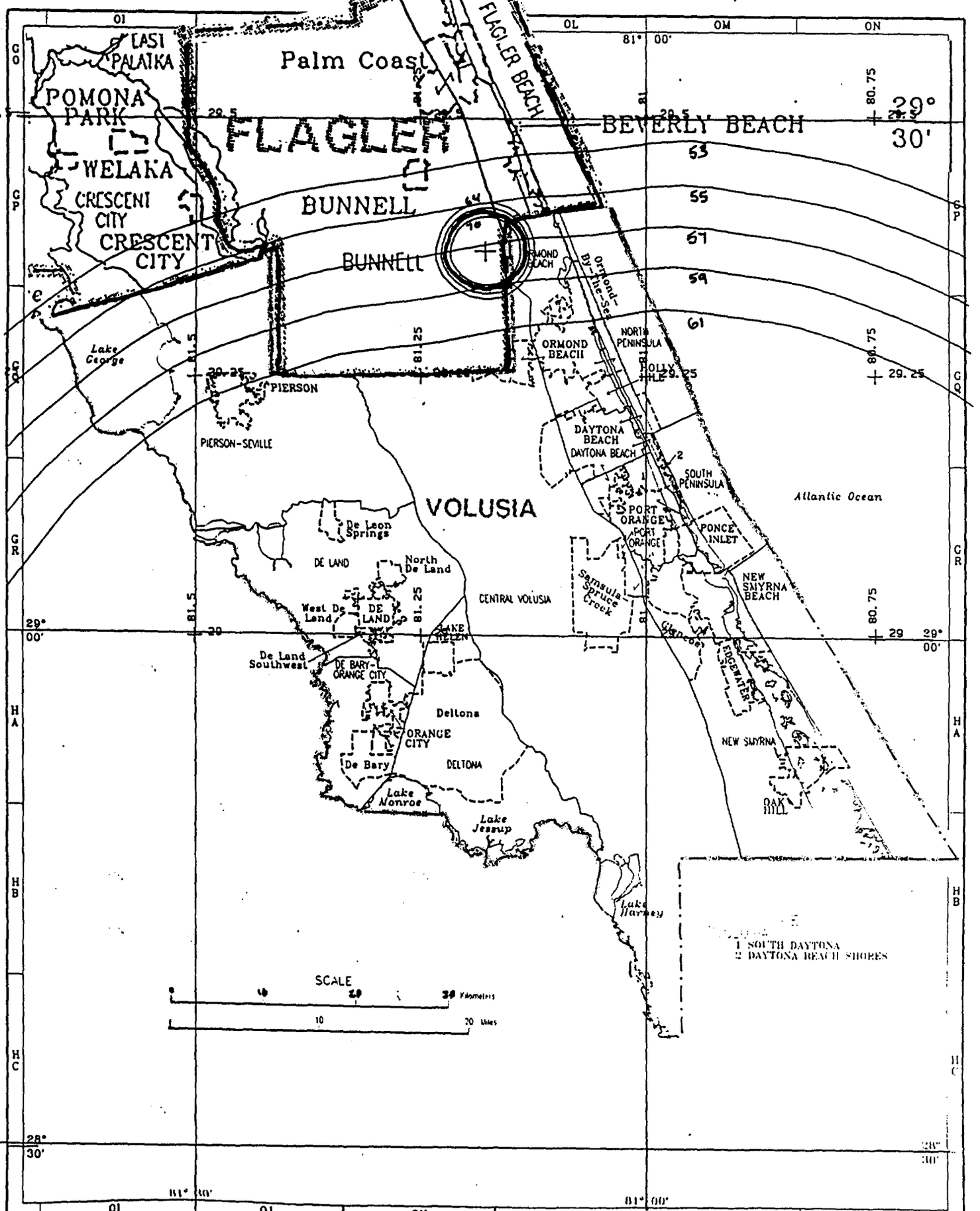
Total = 2,489

Therefore, the proposed facility meets the requirements of Sec. 73.525.

Pages # 5 and #6 of this exhibit are tabular listings of the distances to the relevant channel-six TV and NCE interference study contours as shown on the maps.

Page # 7 is a statement attesting to the qualifications of the preparer.

American Indian Areas, Counties, Coun[illegible]nd Places - Inset A

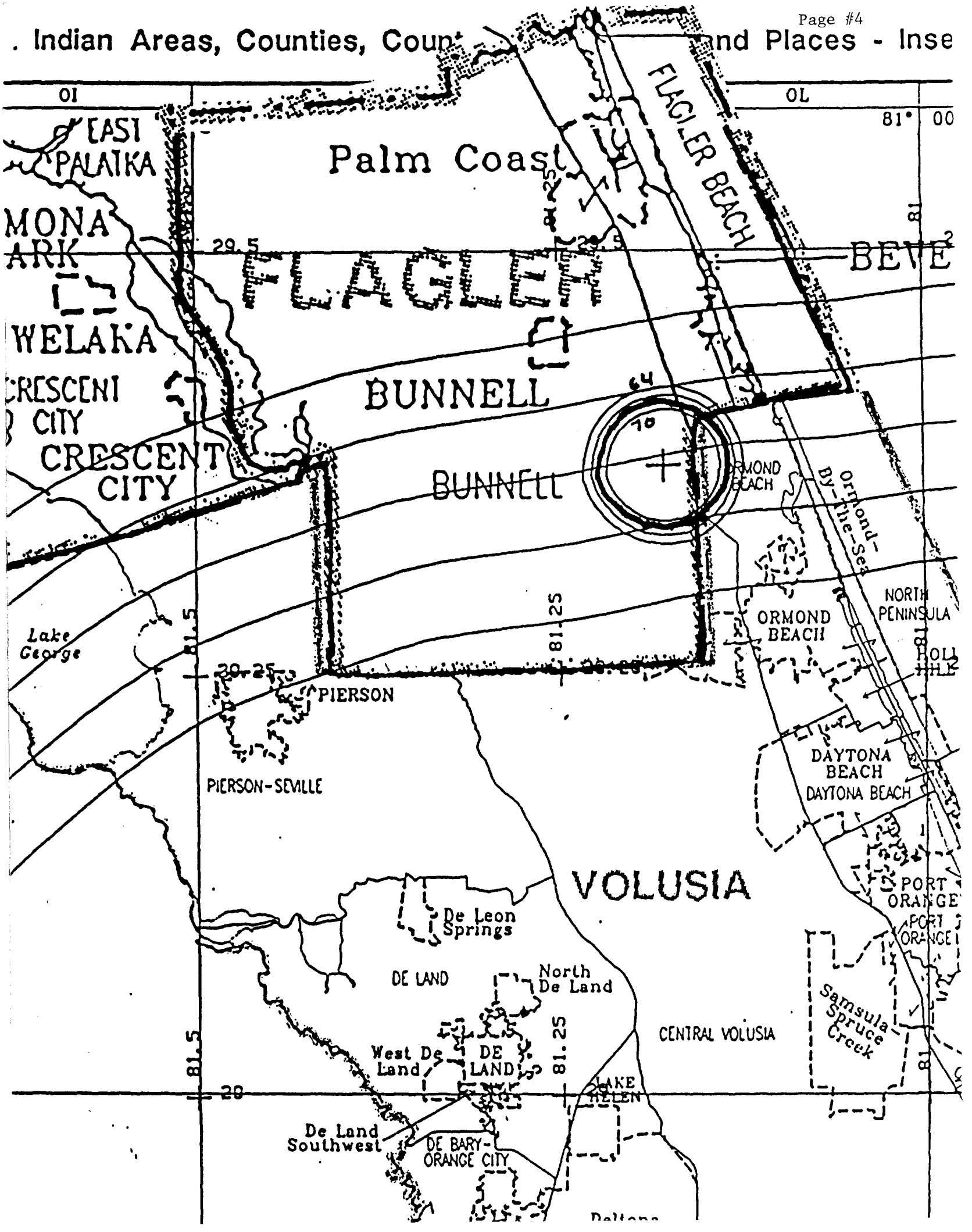


U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census

MAPS

FLORIDA G-9

. Indian Areas, Counties, Coun[illegible]nd Places - Inse



Predicted Signal Contours:

29 22 18 - Cornerstone Community Radio
81 10 45 - Flagler Beach, Florida - CH 212

ERP = .05 kW,-13.01 dBk FM - 2-6 Tables

Radial	HAAT	kW	dBk	Field	64 dBu.1	66 dBu.1	68 dBu.1	70 dBu.1
0 Degs.	56.2M	0.050	-13.010	1.000	5.2	4.6	4.1	3.7
10 Degs.	57.8M	0.050	-13.010	1.000	5.3	4.7	4.2	3.7
20 Degs.	58.3M	0.050	-13.010	1.000	5.3	4.7	4.2	3.8
30 Degs.	59.3M	0.050	-13.010	1.000	5.3	4.8	4.2	3.8
40 Degs.	59.4M	0.050	-13.010	1.000	5.3	4.8	4.2	3.8
50 Degs.	59.7M	0.050	-13.010	1.000	5.4	4.8	4.3	3.8
60 Degs.	59.8M	0.050	-13.010	1.000	5.4	4.8	4.3	3.8
70 Degs.	60.0M	0.050	-13.010	1.000	5.4	4.8	4.3	3.8
80 Degs.	59.9M	0.050	-13.010	1.000	5.4	4.8	4.3	3.8
90 Degs.	59.7M	0.050	-13.010	1.000	5.4	4.8	4.3	3.8
100 Degs.	59.7M	0.050	-13.010	1.000	5.4	4.8	4.3	3.8
110 Degs.	59.3M	0.050	-13.010	1.000	5.3	4.8	4.2	3.8
120 Degs.	58.9M	0.050	-13.010	1.000	5.3	4.8	4.2	3.8
130 Degs.	57.9M	0.050	-13.010	1.000	5.3	4.7	4.2	3.7
140 Degs.	56.3M	0.050	-13.010	1.000	5.2	4.6	4.1	3.7
150 Degs.	56.2M	0.050	-13.010	1.000	5.2	4.6	4.1	3.7
160 Degs.	56.5M	0.050	-13.010	1.000	5.2	4.7	4.1	3.7
170 Degs.	55.0M	0.050	-13.010	1.000	5.2	4.6	4.1	3.6
180 Degs.	54.1M	0.050	-13.010	1.000	5.1	4.5	4.1	3.6
190 Degs.	53.6M	0.050	-13.010	1.000	5.1	4.5	4.0	3.6
200 Degs.	54.6M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
210 Degs.	54.1M	0.050	-13.010	1.000	5.1	4.5	4.1	3.6
220 Degs.	54.3M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
230 Degs.	54.4M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
240 Degs.	56.3M	0.050	-13.010	1.000	5.2	4.6	4.1	3.7
250 Degs.	57.7M	0.050	-13.010	1.000	5.3	4.7	4.2	3.7
260 Degs.	58.5M	0.050	-13.010	1.000	5.3	4.7	4.2	3.8
270 Degs.	56.7M	0.050	-13.010	1.000	5.2	4.7	4.2	3.7
280 Degs.	55.0M	0.050	-13.010	1.000	5.2	4.6	4.1	3.6
290 Degs.	54.9M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
300 Degs.	54.9M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
310 Degs.	54.9M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
320 Degs.	54.9M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
330 Degs.	54.9M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
340 Degs.	54.9M	0.050	-13.010	1.000	5.1	4.6	4.1	3.6
350 Degs.	55.0M	0.050	-13.010	1.000	5.2	4.6	4.1	3.6

Ave. HAAT= 56.8M, Ant. COR= 61.0M AMSL

Predicted Signal Contours:

28 36 08 - WCPX-TV, CH-6 TV
81 05 37 - Orlando, FL

ERP = 100 kW, 20 dBk FM - 2-6 Tables

Radial	HAAT	kW	dBk	Field	53 dBu.5	55 dBu.5	57 dBu.5	59 dBu.5	61 dBu.5
0 Degs.	450.9M	70.560	18.486	0.840	95.8	91.2	86.8	82.3	77.5
10 Degs.	455.1M	86.490	19.370	0.930	98.3	93.5	89.1	84.6	80.0
20 Degs.	455.9M	96.040	19.825	0.980	99.5	94.6	90.1	85.7	81.1
30 Degs.	456.5M	100.000	20.000	1.000	99.9	95.1	90.6	86.1	81.6
40 Degs.	456.2M	92.160	19.645	0.960	99.0	94.2	89.8	85.3	80.7
50 Degs.	455.3M	81.000	19.085	0.900	97.6	92.9	88.5	84.0	79.3
60 Degs.	455.8M	67.240	18.276	0.820	95.7	91.1	86.7	82.2	77.4
70 Degs.	455.5M	67.240	18.276	0.820	95.7	91.1	86.7	82.2	77.3
80 Degs.	455.6M	72.250	18.588	0.850	96.4	91.8	87.4	82.9	78.1
90 Degs.	455.4M	72.250	18.588	0.850	96.4	91.8	87.4	82.9	78.1
100 Degs.	455.1M	64.000	18.062	0.800	95.1	90.6	86.2	81.6	76.8
110 Degs.	453.6M	53.290	17.266	0.730	93.2	88.7	84.3	79.6	74.6
120 Degs.	451.3M	53.290	17.266	0.730	93.0	88.6	84.1	79.5	74.5
130 Degs.	448.8M	65.610	18.170	0.810	94.9	90.4	86.0	81.4	76.6
140 Degs.	445.8M	72.250	18.588	0.850	95.7	91.1	86.7	82.2	77.4
150 Degs.	442.2M	73.960	18.690	0.860	95.7	91.1	86.7	82.2	77.3
160 Degs.	440.8M	70.560	18.486	0.840	95.1	90.5	86.1	81.6	76.7
170 Degs.	441.1M	59.290	17.730	0.770	93.4	88.9	84.4	79.8	74.9
180 Degs.	443.2M	51.840	17.147	0.720	92.2	87.7	83.3	78.5	73.5
190 Degs.	443.7M	57.760	17.616	0.760	93.3	88.8	84.4	79.7	74.8
200 Degs.	444.5M	68.890	18.382	0.830	95.1	90.6	86.1	81.6	76.8
210 Degs.	443.3M	73.960	18.690	0.860	95.7	91.2	86.7	82.2	77.4
220 Degs.	442.5M	70.560	18.486	0.840	95.2	90.7	86.2	81.7	76.9
230 Degs.	442.3M	67.240	18.276	0.820	94.7	90.2	85.7	81.2	76.3
240 Degs.	442.9M	72.250	18.588	0.850	95.5	90.9	86.5	82.0	77.1
250 Degs.	442.7M	88.360	19.463	0.940	97.5	92.9	88.4	84.0	79.3
260 Degs.	444.2M	96.040	19.825	0.980	98.5	93.8	89.3	84.9	80.3
270 Degs.	444.6M	100.000	20.000	1.000	99.0	94.2	89.7	85.3	80.7
280 Degs.	446.2M	92.160	19.645	0.960	98.3	93.5	89.1	84.6	80.0
290 Degs.	447.1M	77.440	18.890	0.880	96.5	91.9	87.4	83.0	78.2
300 Degs.	444.0M	68.890	18.382	0.830	95.1	90.5	86.1	81.6	76.7
310 Degs.	447.4M	72.250	18.588	0.850	95.8	91.2	86.8	82.3	77.5
320 Degs.	449.7M	79.210	18.988	0.890	96.9	92.3	87.8	83.4	78.7
330 Degs.	450.7M	82.810	19.181	0.910	97.5	92.8	88.3	83.9	79.2
340 Degs.	448.0M	75.690	18.790	0.870	96.3	91.7	87.3	82.8	78.0
350 Degs.	446.4M	67.240	18.276	0.820	95.0	90.5	86.0	81.5	76.6

Ave. HAAT= 448.5M, Ant. COR= 458.0M AMSL

Statement of qualifications of the preparer:

I, Doug Vernier, declare that I have studied engineering at the University of Michigan and received degrees from the University in Broadcast Telecommunications; that I have been active in broadcast consulting for over 20 years;

That, I am certified as a Professional Broadcast Engineer # 50258 by the Society of Broadcast Engineers, Indianapolis, Indiana.

That, I have held a Federal Communications Commission, First Class Radiotelephone License continually since 1964. In 1985, this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by Cornerstone Community Radio of New Smyrna Beach, Florida to prepare the attached engineering statement and the technical exhibits appended hereto;

That, I do swear that the technical information contained in same and the facts stated therein are true of my knowledge.

Douglas L. Vernier

January 10, 1994